

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:

BKY Case No.: 24-30025

Chapter 7

Robert Hurst Anderson, Jr.,

Debtor.

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**SUPPLEMENT TO MOTION OF THE CHAPTER 7 TRUSTEE**

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**INTRODUCTION**

Randall L. Seaver, Chapter 7 Trustee (“**Trustee**”) of the bankruptcy estate of Robert Hurst Anderson, Jr. (“**Debtor**”), submits this supplement in support of his motion objecting to the Debtor’s claimed exemptions [Doc. 28].

**REPLY**

The Trustee would like to correct the noted statutory limit allowed pursuant to Minn. Stat. 510.02 and available to the Debtor to claim as exempt in his homestead. The Trustee objected to the Debtor’s homestead exemption. Doc. 28 at p. 4. Mistakenly, the Trustee identified the statutory limit to be \$450,000.00 when the statute provides for a limit that may not exceed \$480,000.00. The Trustee seeks to only limit the Debtor’s claimed homestead exemption to the statutory limit of \$480,000.00.

**CONCLUSION**

As to the Trustee’s objection to the Debtor’s homestead exemption, the Court should limit the Debtor’s homestead exemption to the allowable statutory limit of \$480,000.00.

MOSS & BARNETT  
A Professional Association

Dated: May 7, 2024

By s/ Matthew R. Burton  
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ATTORNEYS FOR RANDALL L. SEAVER,  
TRUSTEE

**VERIFICATION**

I, Randall L. Seaver, Trustee for the Bankruptcy Estate of Robert Hurst Anderson, Jr., declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information and belief.

Date: May 7, 2024

s/ Randall L. Seaver  
Randall L. Seaver, Trustee